



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 5, 2005

Rudy Parker, Treasurer  
Democratic Executive Committee of Florida  
214 South Bronough Street  
Tallahassee, FL 32302

**Response Due Date:**  
**November 4, 2005**

Identification Number: C00005561

Reference: Amended April Monthly Report (3/1/05-3/31/05), received 6/20/05

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Your Amended February Monthly Report (1/1/05-1/31/05), received 6/20/05; Amended March Monthly Report (2/1/05-2/28/05), received 6/20/05; and Amended April Monthly Report (3/1/05-3/31/05), received 6/20/05 disclose memo Schedule A's totaling \$59,558.82 for "FL Party Victory Fund," which appears to be your committee's share of the gross contributions received from a joint fundraising committee. However, there are no corresponding transfers-in from the related joint fundraising committee disclosed on Schedule A supporting Line 12 of the Detailed Summary Page. Please amend your report(s) to clarify this apparent discrepancy.

-Schedule B supporting Line 29 discloses \$9,760 in transfers to what appears to be a non-federal account of your committee. Please provide further clarification regarding this transfer(s) to your non-federal account.

You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. If any of these

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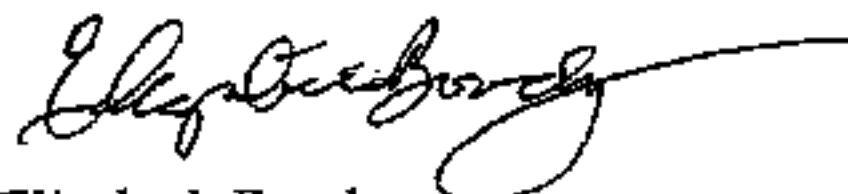
disbursements were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 23, independent expenditures on Schedule E supporting Line 24, or as coordinated expenditures on Schedule F supporting Line 25. 11 CFR §§104.3(b)(3) and 106.1 In addition, if your non-federal account has paid any expenditures which should have been allocated, you are advised to correct any non-compliance with 11 CFR §§106.6 and 106.7 and establish procedures to insure future compliance with allocation regulations.

-During the prior election cycle, your reports disclosed corporate in-kind contributions ("donations") from Anagram Corporation for rent on Schedule H4, supporting Line 21(a) of the Detailed Summary Page. Schedule H4 of this report discloses apparent direct payments to Anagram Corporation for "Rent." Please clarify whether these are direct payments or corporate in-kind contributions received by your committee.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1686.

Sincerely,



Elizabeth Boody  
Campaign Finance Analyst  
Reports Analysis Division

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